

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 21**

PACIFIC MARITIME ASSOCIATION)	
)	
)	
Respondent,)	
)	
and)	Case No. 21-CA-198968
)	
INTERNATIONAL LONGSHORE)	
AND WAREHOUSE UNION LOCAL 13)	
)	
Charging Party.)	
)	

PACIFIC MARITIME ASSOCIATION’S MOTION TO POSTPONE THE HEARING

Pursuant to Section 102.16(a) of the Rules and Regulations of the National Labor Relations Board, Pacific Maritime Association (hereinafter "PMA" or "Respondent"), through its undersigned counsel, hereby moves to reschedule the hearing in the above-referenced matter. In support of its Motion, Respondent states the following:

1. Craig E. Epperson, Senior Vice President - General Counsel and Secretary of PMA, will be PMA’s main witness at the hearing in this matter. Mr. Epperson is traveling to New York on May 8, 2018 and will return on May 10, 2018. The purpose of the travel is business, to attend business meetings and a business function with clients. This travel and Mr. Epperson’s attendance at the business meetings and business function was scheduled and confirmed long prior to the issuance of the Complaint in this matter. As a result, Mr. Epperson will be unable to appear to testify at the hearing in PMA’s case if the hearing’s commencement date of May 7, 2018 is not postponed. PMA will be substantially prejudiced in presenting its case if Mr. Epperson is not permitted to appear and testify.

2. Respondent notified Charging Party International Longshore and Warehouse Union Local 13 (the "Union") that given the schedule of Mr. Epperson, PMA was seeking a postponement of the hearing's start date to either May 15, 2018 or May 22, 2018. The Union responded that it did not oppose a postponement to either of these dates.

3. Accordingly, Respondent proposes the following alternative dates for the hearing to commence: May 15, 2018 or May 22, 2018.

Respectfully submitted,

/s/ Nicole A. Buffalano
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Counsel for Pacific Maritime Association

Dated: March 30, 2018

CERTIFICATE OF SERVICE

I certify that a true and correct copy of Pacific Maritime Association's Motion to Postpone the Hearing was e-filed with the National Labor Relations Board Region 21 via the electronic filing system on March 30, 2018 and served by email, on the same date, upon the following:

William B. Cowen
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Gillian Brett Goldberg
Charging Party's Legal Representative
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/s/ Ryan Sears

Ryan Sears

Dated: March 30, 2018